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FORTISS, LLC and KNIGHTED
13 VENTURES, LLC

14 UNITED STATE DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16

17 DANIEL GERTON, on behalf of himself and
all others similarly situated,

18
19 Plaintiff,

20 vs.

21 FORTISS, LLC, KNIGHTED VENTURES,
LLC, and DOES 1-50,

22
23 Defendant.
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Case No. 3:15-cv-04805-TEH

**JOINT STIPULATION TO CONTINUE
CASE MANAGEMENT CONFERENCE
TO FEBRUARY 1, 2016 – THE
HEARING DATE OF DEFENDANTS’
MOTION TO COMPEL ARBITRATION;
~~PROPOSED~~ ORDER**

Complaint Filed: 10/19/2015
Trial Date: None Set

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1 Plaintiff DANIEL GERTON and Defendants FORTISS, LLC and KNIGHTED
2 VENTURES, LLC, by their undersigned counsel in the matter captioned above, hereby stipulate
3 as follows:

4 WHEREAS, the Court has scheduled an initial case management conference for
5 Monday, January 25, 2016 at 1:30 p.m., and

6 WHEREAS, Defendants' motion to compel arbitration has been set for hearing
7 one week later, on Monday, February 1, 2016 at 10 a.m., and

8 WHEREAS, counsel for the respective parties have conferred and agree that some
9 economies would be achieved both for the Court and for the parties and their counsel by
10 scheduling these two proceedings on the same date at the same time, and

11 WHEREAS, each party supports this requested relief, and

12 WHEREAS, if the Court grants Defendants' motion to compel arbitration, the
13 need for a case management conference at this stage of the case may be obviated,

14 THEREFORE, the parties stipulate and request that the Court order:

- 15 1. That the initial case management conference now scheduled for January
16 27, 2016 shall be continued to the date and time now set for hearing of
17 Defendants' motion to compel arbitration, that is, to February 1, 2016 at 10
18 a.m.
- 19 2. That the parties shall submit their joint case management conference
20 statement by the current deadline of January 15, 2016;
- 21 3. That all other pending deadlines shall remain unchanged.

22 SO STIPULATED:

23 Dated: January 7, 2016

THIERMAN BUCK LLP

24 By: /s/ Joshua D. Buck
25 Mark R. Thierman
26 Joshua D. Buck
27 Attorneys for Plaintiff
28 DANIEL GERTON

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1 Dated: January 7, 2016

JACKSON LEWIS P.C.

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3 By: /s/ Robert M. Pattison
4 Robert M. Pattison
5 Attorneys for Defendants
6 FORTISS, LLC. and KNIGHTED
7 VENTURES, LLC

8 **L.R. 5-1(i) Attestation:** "I hereby attest that
9 I have on file all holographic signatures
10 corresponding to any signatures indicated by
11 a conformed signature (/S/) within this e-
12 filed document."

13 **~~[PROPOSED]~~ ORDER**

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 Dated: 01/14/2016

16 
17 The Honorable Thelton E. Henderson
18 Senior District Judge

19 4831-2828-3180, v. 1
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